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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 CISCO SYSTEMS, INC. and CISCO
TECHNOLOGY, INC.,

14 Plaintiffs,

15 v.

16 SHENZHEN USOURCE TECHNOLOGY
17 CO.; SHENZHEN WAREX
TECHNOLOGIES CO., LTD.; and
18 WAREX TECHNOLOGIES LIMITED,

19 Defendants.

Case No.

**~~PROPOSED~~ ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL RELATED TO
PLAINTIFFS' COMPLAINT AND
EMERGENCY *EX PARTE* MOTION**

AS MODIFIED BY THE COURT

~~PROPOSED~~ ORDER

This matter came before the Court on Plaintiffs' administrative motion to file documents under seal related to Plaintiffs' Complaint and Emergency *Ex Parte* Motion For Temporary Restraining Order filed pursuant to Civ. L.R. 7-11 and 79-5 (the "Administrative Motion"). Plaintiffs seek through their Administrative Motion an Order permitting them to file under seal unredacted versions of the following documents:

No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	Plaintiffs' Complaint	Highlighted portions at 7:7-9 & 13-16; 11:11-26; and 12:11-13 & 17-23.	Contains confidential information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.
	Plaintiffs' Emergency <i>Ex Parte</i> Motion and Memorandum in Support	Highlighted portions at 7:9-10 & 12-21; 8:6 & 24-28; 9:5-12, 14-15, 18, 21-24 & 28; and 10:1-3.	Contains confidential information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.
	Plaintiffs' Decl. of First Witness in Support of Emergency <i>Ex Parte</i> Motion	Highlighted portions at 1:1; and 8:9.	Contains confidential personally identifiable information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.

1	Plaintiffs' Exhs. 1A – 1C to Decl. of First Witness	None.	N/A.
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3	Plaintiffs' Decl. of Second Witness in Support of Emergency <i>Ex Parte</i> Motion	Highlighted portions at 1:1 & 11; 3:1-2, 21 – 26 & 28; 4:1-4, 6-7, 22-23 & 25-27; 5:9, 11, 13, 24 & 27; 10:2, 8-20, 22, 25 & 27; 7:11-16 & 22-27, and 8:12.	Contains confidential personally identifiable information and other information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.
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10	Plaintiffs' Declaration of Third Witness in Support of Emergency <i>Ex Parte</i> Motion	Highlighted portions at 1:1 & 22-28; 2:1-3, 5 & 21-23; 6:15-16, 19 & 21-28; 7:1-2 & 8; and 10:7-8 & 22.	Contains confidential personally identifiable information and other information related to Plaintiffs' internal strategies, knowledge and relationships detailing how Plaintiffs produce and protect their products and intellectual property. <i>See</i> First Witness Decl. ¶ 26; Second Witness Decl. ¶¶ 8, 10-11, 12, 14, 20 & 24; Third Witness Decl. ¶¶ 3, 5 & 31; Wilkins Decl. ¶¶ 3 – 6. Public disclosure of this information would cause harm to Plaintiffs and others. <i>See</i> First Witness Decl. ¶¶ 3, 8-10, 16-19, 22 & 24; Wilkins Decl. ¶¶ 5 – 8.
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18	Plaintiffs' Exhs. 3D – 3E to Decl. of Third Witness	None.	N/A.
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20 Having considered Plaintiffs' Administrative Motion and Memorandum in support thereof,
 21 the Declaration of Gabriella A. Wilkins in support of that Administrative Motion, the Declarations
 22 of the First, Second and Third Witnesses in Support of Plaintiffs' Emergency *Ex Parte* Motion for
 23 Temporary Restraining Order, redacted and unredacted versions of the documents Plaintiffs
 24 propose to file under seal reflecting the precise portions of those documents to be redacted in the
 25 public record, and Plaintiffs' Proposed Order, this Court:

1 FINDS Plaintiffs have shown COMPELLING REASONS to support filing these
2 documents under seal;

3 GRANTS Plaintiffs' Administrative Motion; and

4 HEREBY ORDERS that the unredacted documents shall be filed under seal, and the
5 redacted versions of these documents shall be placed in the public record.

6 The Clerk shall file the redacted complaint in this matter and randomly assign the case.

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8 IT IS SO ORDERED.

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10 DATED: July 16, 2020



United States District Court Judge
The Honorable Beth Labson Freeman